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Esteemed FCC Commissioners and other concerned parties,

I'm writing to you today on behalf of my company, Valnet, regarding petitions filed by CTIA and T-Mobile regarding proposals to make significant changes to the CBRS band.

Valnet is a Wireless Internet Service Provider (WISP) in Southeast Kansas, just a few miles from Commissioner Pai's home town. For over 15 years we've served the area; with over 1,000 residential and business subscribers throughout several counties in the region, with services ranging from 1.5Mbps to 30Mbps utilizing 2.4GHz and 5GHz unlicensed spectrum; as well as 3.65GHz licensed.

As a small business in mid-America, we simply cannot compete with the likes of T-Mobile, Verizon, and AT&T when purchasing large monolithic licenses over PEA regions. The development of the CBRS band gives us hope for the future – hope that we could engage in GAA or PAL licensed use of a band explicitly allocated for point to multipoint wireless services, addressing the increasing pollution of the 900MHz, 2.4GHz, and 5GHz unlicensed bands.

Simply put, having 150MHz spectrum available for our use along with affordable licensing is a complete game changer. It cannot possibly be understated how transformative that this spectrum will be for the WISP industry as a whole. Access to clean, well propagating spectrum will allow us to provide higher quality of experience, higher bandwidths, and serve more subscribers that we simply can't reach with 2.4GHz and 5GHz systems.

Valnet currently plans on basing the next generation of our network on 3.5GHz CBRS LTE systems. This technology will enable the performance, reliability, and propagation required to continue to provide consumers with the service level they want, as well as serve more consumers who currently may only have slow and underperforming satellite based options, or use of mobility solutions that have onerously small data limits.

The proposals by CTIA and T-Mobile are nothing short of a big-business spectrum grab. These changes in licensing would effectively corner small businesses – nearly the entire WISP industry – out of any option for purchasing PAL licenses. We provide vital services to our customers, and ruling us as a second class citizen status is both unfair, and against the spirit of the **CITIZENS** Broadband Radio Service – it is *not* the **Big Business** Broadband Radio Service.

In addition to the proposed licensing changes relegating small businesses to a second class status, allowing PAL licensing while simultaneously removing grandfathered

protection in the 3650-3700MHz spectrum is also untenable; when combined with the licensing changes this would cause the entire band to be relegated to big business use for 5G networks - a significant blow to the development of real diversity of choice in consumer broadband services throughout the country.

The mobility operators have access to plenty of suitable spectrum, while the WISP industry does not. Imagine the economic benefit to our country if we're allowed to use this real spectrum and actual licensing opportunities to provide more availability, more speed, and more choice to consumers!

There's no reason at all that the 5G network carriers can't use the band in exactly the way they want to under the existing rules, and the industry springing up around CBRS LTE is willing to share under the terms already ruled by the FCC. With the proposed changes, the nation loses out in adding an additional avenue of choice for consumers.

Valnet strenuously opposes the CTIA and T-Mobile petitions, and we implore the FCC to rule that the proposed licensing changes will not be approved.

Sincerely,

A handwritten signature in cursive script that reads "Nick Bright".

Nick Bright
Vice President of Technology
Member
Valnet Holdings, LLC